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July 19, 2006

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RECEIVED
UNITED STATES
ATTORNEY'S OFFICE
W.D.N.Y.

William H. Bowne, III, Esq.
620 Federal Building
100 State Street
Rochester, New York 14614

Re: U.S. v. Eldridge

Dear Mr. Bowne:

I have reviewed the voluntary discovery provided by the Government. There are some remaining discovery issues as to which I would like your response.

The specific discovery requests are as follows:

1. Records of any contacts or communications between Gail Eldridge and the co-defendants Lyttle, Montana, and Knight prior to August 28, 1999.
2. Records of any contacts or communications between Gail Eldridge and the co-defendant Montana prior to December 2000.
3. Documentation as to the amount of funds solicited by the co-defendants Montana, Lyttle, or Knight prior to August 28, 1999.
4. Records of any contacts between Gail Eldridge and any clients of the co-defendants prior to the time that First National Equity and the P.K. Trust parted with their funds to UTA-BVI.
5. Records of all fees, costs, margin charges, interest, and commissions charged by Bill Marvin, DLJ, Bank of America, and First Union related to the funds transferred to UTA-BVI by P.K. Trust and First National Equity.
6. Records of any contacts or communications between Gail Eldridge and the clients of the co-defendants wherein Gail Eldridge is alleged to have endorsed, encouraged, or lulled any client to keep funds with the co-defendant(s).
7. Records of the date when Gail Eldridge allegedly commenced her involvement in this conspiracy.
8. Records of the date when Gail Eldridge allegedly decided with the co-defendants to obtain money and property under false pretenses.
9. Records establishing that Gail Eldridge directed any of the co-defendants to approach their respective clients to raise funds for false purposes.

EXHIBIT M

Page Two

10. Records establishing that Gail Eldridge participated in offering to the public investments with First National Equity or P.K. Trust.
11. Records establishing that Gail Eldridge required a minimum investment from the co-defendant's clients be paid to First National Equity or P.K. Trust.
12. Records establishing that Gail Eldridge solicited the co-defendant Knight or Lytle to place funds with UTA-BVI.
13. Records establishing that Gail Eldridge knew of the source of the funds deposited by co-defendants Lytle and Knight at the time of transfers to UTA-BVI accounts.
14. Records establishing who controlled UTA-BVI prior to March 2000.
15. Records establishing the defendant's full name.
16. Records establishing Gail Eldridge as an officer of First Chase Holdings, LLC. and First Chase Holdings, Inc.
17. Records establishing the date when Gail Eldridge was the controlling officer of First Chase Holdings, LLC. and First Chase Holdings, Inc.
18. Records establishing Gail Eldridge's involvement in wire transfers of \$403,762 for UTA-BVI brokerage account to an attorney's trust account in Conway, Washington.
19. Records of any wiretap orders, search warrants, supporting affidavits and the like involving Gail Eldridge in this case or in the pending Florida investigation.
20. A copy of all police reports related to the Florida investigation.
21. Records of the net worth, income, or other financial records establishing the financial condition of the clients of each co-defendant which are the subject of this indictment.
22. Records of all costs, fees, commissions, and any other form of compensation received by William Marvin and/or DLJ for directing UTA-BVI investments into Pinnacle Insurance and any other privately placed investments.
23. Record of all costs, fees, commissions, and any other forms of compensation received by Marc Robinson from UTA-BVI, DLJ, Bill Marvin, Bridgewater, First Chase Holdings, LLC, First Chase Holdings Inc. or any other entity associated with Gail Eldridge.

Thank you for your consideration. We look forward to your prompt reply.

Very truly yours,



Maurice J. Verrillo
pc: Gail Eldridge